

**Lewis
Baach
Kaufmann
Middlemiss**
PLLC

Adam S. Kaufmann
212 822 0128
adam.kaufmann@lbkmlaw.com

April 2, 2025

VIA ECF

Honorable Carol Bagley Amon
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Alain Bibliowicz*, 25-cr-00039 (CBA)
Clarification of Release Order

s/Carol Bagley Amon

Dear Judge Amon,

We write with the consent of the government to raise two issues pertaining to the Order Setting Conditions of Release dated March 10, 2025 (ECF No. 257) (the "Release Order"). The two issues are:

1. Summer travel for Mr. Bibliowicz's children.
2. Clarifying the Release Order per the request of Pretrial Services.

First, Mr. Bibliowicz's children, prior to his arrest, had plans to travel abroad this summer (two of the plans were already set and tickets purchased or tuition paid, the third is not yet paid for, as discussed below). We respectfully request that the children be permitted to travel as outlined below. We have structured this proposal so that at least one of Mr. Bibliowicz's children will be in the United States at all times; all three will not be abroad at any time.

The proposed travel includes the following:

1. Child 1 is a sophomore in college. He was accepted into a summer study program at the IESEG School of Management in Paris from July 7 to 31. The program is fully paid for; airline tickets have not been purchased. We propose he be permitted to depart on or about July 6 returning around August 4.
2. Child 2 is a senior in high school. Her has two planned trips; all tickets and bookings previously purchased.
 - a. A senior class trip Bahamas from May 29 to June 2.
 - b. He has a graduation trip to Europe with friends from June 20 to July 21.